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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

- v. - :

INDICTMENT

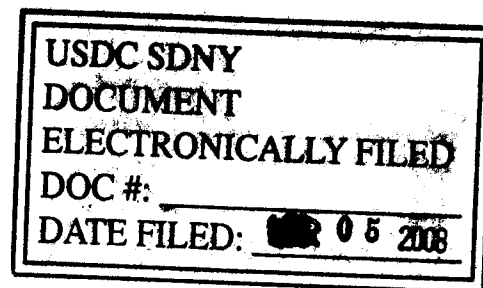
VYACHESLAV MANOKHIN, and :
VLADIMIR DEREVIANKO, :

S1 07 Cr. 815 (HB)

Defendants. :

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COUNT ONE



The Grand Jury charges:

1. From at least in or about July 2004, up to and including in or about August 2007, in the Southern District of New York and elsewhere, VYACHESLAV MANOKHIN and VLADIMIR DEREVIANKO, the defendants, and others known and unknown, unlawfully, wilfully, and knowingly combined, conspired, confederated, and agreed together and with each other to violate the laws of the United States, to wit, to violate Section 1546(a) of Title 18, United States Code.

2. It was a part and an object of the conspiracy that VYACHESLAV MANOKHIN and VLADIMIR DEREVIANKO, the defendants, and others known and unknown, unlawfully, wilfully, and knowingly would and did use, possess, obtain, accept, and receive an immigrant and nonimmigrant visa, permit, border crossing card, alien registration receipt card and other document prescribed by statute and regulation for entry into and as evidence of

authorized stay and employment in the United States, knowing it to have been procured by means of a false claim and statement, and to have been otherwise procured by fraud and unlawfully obtained, in violation of Title 18, United States Code, Section 1546(a).

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about August 18, 2005, at United Nations headquarters in Manhattan, New York, VYACHESLAV MANOKHIN, the defendant, provided ten fraudulent letters to another person, in support of, among other things, various aliens' applications for entry visas to enter the United States for a United Nations conference.

b. On or about February 5, 2007, VLADIMIR DEREVIANKO, the defendant, represented to a federal immigration official that a conference would be attended that day at a law firm in New York, New York, by approximately ten people when, in truth and in fact, that was not the case.

(Title 18, United States Code, Section 371.)

COUNT TWO

The Grand Jury further charges:

4. On or about February 5, 2007, in the Southern District of New York and elsewhere, VLADIMIR DEREVIANKO, the defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit, an investigation being conducted by federal immigration officials, unlawfully, wilfully and knowingly falsified, concealed and covered up by trick, scheme, and device material facts, and made materially false, fictitious and fraudulent statements and representations, to wit, DEREVIANKO told a federal immigration official that a conference would be attended that day at a law firm in New York, New York, by approximately ten people when, in truth and in fact, that was not the case.

(Title 18, United States Code, Section 1001(a).)

Forfeiture Allegations

5. As the result of committing the offense alleged in Counts One and Two of this Indictment, VYACHESLAV MANOKHIN and VLADIMIR DEREVIANKO, the defendants, shall forfeit to the United States pursuant to Title 18, United States Code, Sections 982(a)(3) and 982(a)(6), all conveyances used in the commission of the violations; all property, real and personal, that constitutes or is derived from or is traceable to proceeds obtained directly or indirectly from the commission of the

offenses; and all property, real or personal, that was used to facilitate, or was intended to be used to facilitate, the commission of the offenses, including but not limited to the following:

a. Money Judgment

A sum of money representing property that was involved, directly or indirectly, in the offenses or is traceable to such property.

Substitute Asset Provision

6. If any of the above-described forfeitable property, as a result of any act or omission of VYACHESLAV MANOKHIN and VLADIMIR DEREVIANKO, the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

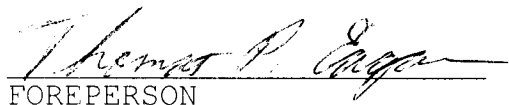
c. has been placed beyond the jurisdiction of the Court;


d. has been substantially diminished in value;
or

e. has been commingled with other property which cannot be subdivided without difficulty;
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any

other property of VYACHESLAV MANOKHIN and VLADIMIR DEREVIANKO, the defendants, up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982(a)(3) and 982(a)(6).)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

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SOUTHERN DISTRICT OF NEW YORK

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- v. -

VYACHESLAV MANOKHIN, and
VLADIMIR DEREVIANKO,

Defendant.

INDICTMENT

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(18 U.S.C. §§ 371, 1001, 1546(a))

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL

Thomas P. Cappa
Foreperson.

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Ellis, J.